



Federal Aviation Administration

Memorandum

Date: September 13, 2021

To: Docket No. FAA-2019-0770

Subject: Summary of Airlines for America (A4A) meeting with the Federal Aviation Administration (FAA) Regarding the Flight Attendant Duty Period Limitations and Rest Requirements Notice of Proposed Rulemaking Pursuant to Executive Order 12866

On September 13, 2021, the Office of Management and Budget, Office of Information and Regulatory Affairs, hosted a meeting between Airlines for America (A4A), the U.S. Department of Transportation, and the Federal Aviation Administration (FAA). A4A believes the statutory requirement in the 2018 FAA Reauthorization Act to increase flight attendant rest requirement without exception will incur significant costs for its members. A4A believes any other regulatory mandates the FAA could impose beyond those the statute requires would increase costs further. A4A further believes the costs reflected in the data the FAA received in response to the 2019 Advance Notice of Proposed Rulemaking have increased, specifically cost of wages. A4A stated certificate holders' estimated costs would be greater than the costs noted when certificate holders submitted their comments. A4A highlighted three areas affected by COVID-19: reserve time; number of flight attendants in the industry; and increased costs for software. A4A provided several recommendations to potentially control costs, such as providing flexibility for day-of schedule changes.